

April 24<sup>th</sup>, 2023

National Institutes of Health  
Office of the Director  
9000 Rockville Pike  
Bethesda, Maryland 20892

**RE: Request for Information on the NIH Plan to Enhance Public Access to the Results of  
NIH-Supported Research  
Notice Number: NOT-OD-23-091**

Taylor & Francis is a leading global research publisher, focused on advancing science and fostering human progress through knowledge – something we’ve been doing since 1798. Across the organization, we provide a wide range of publishing outlets for scholarly research, including books, eBooks, journals, and open research publishing venues. We are committed to expanding the range of fully open access publishing options across our portfolio. We partner with over 150 US-based learned societies and expert associations to make research available to the communities they serve.

We appreciate the opportunity to provide comment on NIH’s Public Access Plan and offer the following recommendations:

**Question 1 Recommendations**

1. Convene a cross-stakeholder discussion/s to refine NIH’s requirements and ensure implementation of the plan in the most optimum way to deliver equity.
2. Continue active collaboration with the academic publishing community to elicit feedback on the implementation of the plan – and provide a route for us to share the global and disciplinary specific feedback we receive around access and equity issues.

**Question 2 Recommendations**

1. Provide training to grantees on key aspects of how best to communicate and disseminate research in ways that ensure compliance of NIH requirements. Ensure awareness of best practice and standards to support discoverability and access.
2. Collaborate with publishers to develop more tailored research and more focused findings – to maximize the potential for research to reach its target audience/s.
3. Create guides encouraging the use of alternative text for visual or print impaired individuals.
4. Appoint staff resources to support NIH Accessibility requirements

### Question 3 Recommendations

1. Empower authors to make the decisions for disseminating their research.
2. Provide training materials for authors and grant managers to collaborate on finding the best route to publish.

### Question 4 Recommendations

1. Align with other funders to assign common PIDs for NIH grants – consider using the established framework provided by the Crossref Funding Registry.
2. Utilize current and prevalent PID infrastructure where possible to avoid creating additional learnings (and need for interoperability building) for researchers.
3. Adopt researcher-centered practices to capture key descriptive information – using auto-complete/ integrated links, drop-down lists, and APIs to other websites to keep simple, avoid manual entry, and ensure accurate completion; include PIDs assignment for grant-related information in existing NIH systems/those used by its researchers where possible.
4. Monitor and adopt industry and global standards and best practices where applicable.

### Full Comments

1. *How to best ensure equity in publication opportunities for NIH-supported investigators.*

T&F is committed to delivering a range of publishing options and content types that are inclusive, holistic and provide opportunities for researchers working across career stages and disciplines. We are keen to continually develop approaches to ensure equity and diversity in publication opportunities and we know that this requires input and collaboration between multiple stakeholders from across the scholarly ecosystem. Specifically, it requires publishers to help researchers and more marginalized communities across career stage by providing training to navigate the publishing landscape – and understand the options available. It requires funders to investigate their processes for grant selections, so that grant opportunities are not exclusively awarded to the same highly resourced researchers and institutions. University efforts to expand opportunities through institutional grants can help to reduce inequities and provide a diversity of voices. Collaborative commitment to tackle the challenge of increasing equity from diverse stakeholders ensures that all knowledge makers are given the opportunity to contribute, irrespective of race, ethnicity, gender, geography, language, discipline, or funding source. NIH can be a leader in convening these stakeholders to help discuss ways to broaden equity.

T&F is committed to equity in publication opportunities and has taken the following steps to answer this call to action.

T&F offers over 300 dedicated OA journals, and more than 95% of our venues offer an OA pathway. We work with authors to find the best home for their work. Across our portfolio we also offer an increasing number of tailored fully open access publishing venues which increase the opportunities for researchers to publish research outside of more selective venues, and ensures that regardless of the results (e.g. negative, null, incremental research), there is an outlet

for researchers to make their findings discoverable and accessible to all. This includes our ‘open research’ publishing venues provided by F1000. The F1000 publishing model combines the speed of preprints with the benefits of full publication. This includes functionality that ensures the robustness, quality, and transparency of research using rigorous editorial checks, open data, and invited open peer review. Authors are given autonomy throughout the entire publishing process.

Publishing venues that operate on this basis help to remove the barriers to publication that many researchers face, particularly early career researchers, and are entirely aligned with the DORA principles. T&F is signed up and committed to the DORA declaration, the Managing Director of our imprint F1000, is a member of DORA's Board of Advisers – and through this we are developing ways to support researchers across all career stages and disciplines to share the outputs of their research in more transparent and accessible ways.

In addition to providing more trusted and reputable routes for researchers to publish their work, our role as a publisher is to support initiatives to build capacity and skills to help deliver trust and value in the research we receive and publish. An example of this is when in 2019, T&F launched the ‘Excellence in Peer Review: Taylor & Francis Reviewer Training Network’. This aims to provide clear practical advice to researchers to improve the quality of their reviews and introduce the key principles to early career researchers and researchers from under-represented groups. This initiative encourages greater inclusion and participation in peer review.

We support the initiative for Transforming Institutions by Gendering contents and Gaining Equality in Research (TRIGGER). This aims to understand and address the causes behind under-representation of women in Science, Technology, Engineering, Mathematics, and Medicine (STEMM) subjects.

We were also the 2021 publisher winner of ABC International Excellence Award for Accessible Publishing, recognized by the Award’s judges for an “innovative approach to alternative text for images, graphs, and diagrams.”

T&F believes in the importance of public access to amplify and communicate research that delivers change and improves lives. We would like to encourage the NIH to collaborate actively with publishers to ensure we are positioned to provide the services that are needed to drive equity and access to research.

### **Question 1 Recommendations**

1. Convene a cross-stakeholder discussion/s to refine NIH’s requirements and ensure implementation of the plan in the most optimum way to deliver equity.
2. Continue active collaboration with the academic publishing community to elicit feedback on the implementation of the plan – and provide a route for us to share the global and disciplinary specific feedback we receive around access and equity issues.

2. *Steps for improving equity in access and accessibility of publications. NIH welcomes input on other steps that could be taken to improve equity in access to publications by diverse communities of users, including researchers, clinicians and public health officials, students and educators, and other members of the public.*

Ensuring all functionality and content is accessible to all people is a laudable ambition. Developing clear guidelines for formatting with a focus on accessibility will improve access for everyone. One of the primary roles of publishers is to transform content from authors into a final product through typesetting and copyediting. This labor-intensive effort alongside the creation and sharing of article metadata is critical for making content machine readable and discoverable.

Across the company, T&F is developing new formats and tailored views of research that are designed to support access, use, and reuse of research. One of the emerging tools is the implementation of Plain Language Summaries (PLSs). These additional abstracts allow us to succinctly summarize the key points from a piece of scientific research to a non-technical audience. Creating PLSs tailored views of content is an important way to increase access, engagement in research content and findings to the various communities and stakeholders who are the ultimate users of research, including policymakers, students, educators, and the public.

Through our society partners, funders and other expert community links, we have a wealth of experience in developing research access and dissemination strategies and solutions. By collaborating alongside knowledge creators and federal agencies, publishers can create models and formats that are designed to deliver the requirements of our stakeholders. Emerging scientific innovations require training for authors to remain at the forefront of their fields. T&F works alongside our expert academic editors and societies and we have a depth of experience in providing research communication, sharing, and dissemination training to researchers across the career stages and across disciplines e.g. How to manage and share data; How to publish for reach and impact; How to peer review effectively. We are willing and able to support the NIH in providing training to its various cohorts of grantees.

We provide guidance and best practice to our authors and editorial boards to ensure that content is published with adherence to various accessibility standards. For example, we have in-house experts who can provide authors with a guide to alternative text so that they can provide the best descriptions. We also provide content in a variety of formats including PDF, ePub2, ePub3, and HTML formats to expand equity and accessibility. T&F has adopted this practice and works to provide a suitable format – we provide these formats on request from individuals and institutions.

In 2022, T&F brought on our first Accessibility Officer to provide oversight, coordination, guidance, and leadership to the organization's Accessibility Working Group. This addition has already provided the organization with a more effective and efficient accessibility strategy. If not done so already, the NIH could consider appointing staff resources with specific remit and responsibility for ensuring accessibility.

## **Question 2 Recommendations**

1. Provide training to grantees on key aspects of how best to communicate and disseminate research in ways that ensure compliance of NIH requirements. Ensure awareness of best practice and standards to support discoverability and access.
  2. Collaborate with publishers to develop more tailored research use-focused findings and output – to maximize the potential for research to reach its target audience/s.
  3. Create guides encouraging the use of alternative text for visual or print impaired individuals.
  4. Appoint staff resources to support NIH Accessibility requirements.
3. *Methods for monitoring evolving costs and impacts on affected communities. NIH proposes to actively monitor trends in publication fees and policies to ensure that they remain reasonable and equitable. NIH seeks information on effective approaches for monitoring trends in publication fees and equity in publication opportunities.*

T&F acts as a responsible steward with the funds we receive from researchers in return for the publishing services that we provide. Our role is to preserve academic freedom and provide routes to share, disseminate, and deliver impact from research. We provide options for researchers working across all career stages and disciplines to reach their intended audiences and their communities of interest and help build careers and research capacity. We do not support blunt measures and restrictions on where researchers can publish – instead preferring to develop solutions collaboratively to deliver sustainable publishing solutions that preserve academic freedom and choice, while maximizing the reach, access and potential impact of research.

When calculating prices for APCs, T&F aims to be transparent with our costs and mitigate inequities with our stakeholders. We continue to balance this transparency with market considerations and remain compliant with U.S. antitrust price fixing laws. List price APCs across T&F journals range from US \$600 to US \$4,800. The list price APC is reviewed at least annually across journals and varies across several factors, including:

**Funding available for the journal:** this varies by discipline. Additionally, some journals are supported through grants, typically from their owning society, meaning charges are subsidized.

**Impact:** highly selective journals typically charge higher APCs. The APC on the accepted article also covers the work and analysis put into rejected content.

**Discipline:** we set APCs based on funding patterns within the field, as well as benchmarking against APCs on related journals to ensure that rates are realistic and equitable among communities.

**Demographics of submissions / publications:** considering the geography of submissions allows us to price fairly to market.

**The type of research output:** shorter article types and non-traditional formats typically incur lower APCs.

It should be noted that many customers do not pay the list price APC, benefitting from flexible funding options including:

- Discounts of up to 100% where a professional member association or learned society provide additional support.

- Discounts due to their organization's participation in a membership scheme or transformative agreement, which usually allow researchers to submit without any individual payment on their part.

T&F is committed to cost transparency and providing our published authors with world class services so that their work can have the greatest impact on society.

### Recommendations Question 3

1. Empower authors to make the decisions for disseminating their research.
2. Provide training materials for authors and grant managers to collaborate on finding the best route to publish.
4. *Early input on considerations to increase findability and transparency of research. Section IV of the NIH Public Access Plan is a first step in developing the NIH's updated plan for PIDs and metadata, which will be submitted to OSTP by December 31, 2024. NIH seeks suggestions on any specific issues that should be considered in efforts to improve use of PIDs and metadata, including information about experiences that institutions and researchers have had with adoption of different identifiers.*

We are entirely aligned to support any push that the NIH has in promoting the use and integration of persistent identifiers (PIDs), research descriptors, and metadata into grant and publishing workflows.

PIDs and associated metadata are the essential foundation blocks to enable the discoverability and access of research and its findings. Like many publishers, T&F is a member of Crossref and ensures high quality metadata around all the research it publishes; we are also building our capabilities for inclusion of funding and grant data associated with articles by utilizing the Crossref Funding Registry.

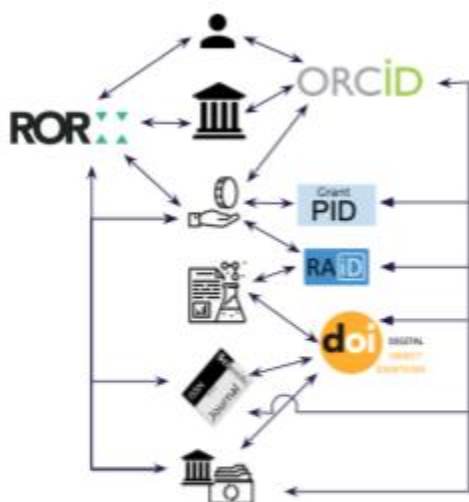
Several funding agencies are also now members of Crossref (e.g. Wellcome) and register DOIs for all their awarded grants. By assigning a PID (e.g. a DOI) to its grants, the NIH would provide an identifier that can be captured by publishers in the article submission workflow and thereby allow grant output connections to be made and greatly simplify impact-related (and ROI) tracking for the NIH.

Adding grant IDs would add new information into this network of PIDs and provide increased transparency and create the possibility for robust ROI calculations for funders. This wider network of PIDS would include:

- Researcher IDs – e.g. ORCiD
- Institution IDs – e.g. ROR or Ringgold
- Funder IDs – e.g. FundRef
- Project IDs e.g. RAID
- Research object IDs e.g. DOIs for publications, data, preprints, code and other outputs

Adding all (or a selection) of these PIDs into the metadata of research articles and objects stored in other online locations (e.g. data repositories) will ensure progress to a more machine-readable ecosystem to enable analysis and ROI for funders. Most of the PID issuing agencies – ORCID, Crossref, Datacite, RORs – operate on a not-for-profit basis and are the commonly used standards across the research system. To support the simple capture of relevant research and researcher meta-data in its grant workflows, we recommend the NIH consider:

- Providing integrated links
- Drop-down lists
- APIs to other websites



*An approximate representation of a PID-enabled research information workflow. This image is based on the workflows described in Developing a persistent identifier roadmap for open access to UK research <http://repository.jisc.ac.uk/id/eprint/7840>*

#### Recommendations Question 4

1. Align with other funders to assign common PIDs for NIH grants – consider using the established framework provided by the Crossref Funding Registry.
2. Utilize current and prevalent PID infrastructure where possible to avoid creating additional learnings (and need for interoperability building) for researchers.
3. Adopt researcher-centered practices to capture key descriptive information – using auto-complete/ integrated links, drop-down lists, and APIs to other websites to keep simple, avoid manual entry, and ensure accurate completion; include PIDs assignment for grant-related information in existing NIH systems/those used by its researchers where possible.
4. Monitor and adopt industry and global standards and best practices where applicable.

#### Additional Public Access Plan Feedback



***III.A.3.b. Final published article submission:*** *the NIH-supported investigator will be expected to either ensure the final peer-reviewed manuscript is submitted to PMC upon acceptance for publication, to be made publicly available at the time of publication or arrange with the journal to deposit the individual published article to PMC without a post-publication embargo.*

T&F requests clarification of this guidance to ensure compliance with the F1000 publishing model. According to the guidance, “*the final peer-reviewed manuscript is submitted to PMC upon acceptance for publication.*”

F1000 operates an open research, post-publication peer review model across all its publishing venues (and provides publishing services for a number of funding agencies including the Bill and Melinda Gates Foundation, European Commission and Wellcome). Like more traditional journals, once content is approved through the F1000 peer review process, a ‘final peer reviewed manuscript’ is created and indexed broadly, including in PubMed and PMC. Our F1000 publishing model was designed to be entirely compliant with OA and open data requirements and mandates of organizations focused on driving open access and delivering research more broadly (including alignment with NIH policies).

We request that the NIH Public Access Plan does not inadvertently create ambiguity or exclude content from reputable and recognized publishers, such as F1000, who are operating a different model to deliver fully OA, peer reviewed and validated content to PMC.

Thank you for considering our recommendations. We are committed to working with NIH to produce and implement a Public Access Plan that brings benefits to all stakeholders in the research system.

We would very much welcome the opportunity to discuss our findings and recommendations with you at your earliest convenience.

Kind regards,

A handwritten signature in black ink that reads "Andrew Bostjancic". The signature is written in a cursive, flowing style.

Andrew Bostjancic  
Open Research Policy and External Affairs Manager  
Taylor & Francis